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7 COMPANY dba GOLDSTAR
TRUST COMPANY
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16 Attorneys for Plaintiffs KOLETTE A. PAGE
and CLETUS M. PAGE, individually and on
17 behalf of their individual retirement accounts

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 KOLETTE A. PAGE and CLETUS M.
PAGE, individually and on behalf of
21 their individual retirement accounts,

22 Plaintiffs,

23 v.

24 MINNESOTA LIFE INSURANCE
COMPANY, a Minnesota corporation;
25 SHURWEST HOLDING COMPANY,
INC., an Arizona corporation;
26 SHURWEST, LLC, an Arizona limited
liability company, HAPPY STATE
27 BANK AND TRUST COMPANY dba
GOLDSTAR TRUST COMPANY, a
28 Texas business entity (corporate status

Case No. 8:18-cv-01208-AG-(KESx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Assigned to the Hon. Andrew J.
Guilford

Complaint filed: July 9, 2018
Current response date: August 10, 2018
New response date: September 10, 2018

1 unknown); FUTURE INCOME
2 PAYMENTS, LLC, a Delaware limited
3 liability company; CMAM, INC. dba
4 HERITAGE FINANCIAL SERVICES,
5 a California corporation; ALBERT
6 ANDREW MANFRE, an individual;
7 JEANETTE MANFRE, an individual;
8 MATTHEW LEE BIESER, an
9 individual; and DOES 1-10, inclusive.

10 Defendants.

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12 **TO THE CLERK OF THE ABOVE ENTITLED COURT,**

13 Pursuant to Local Rule 8-3, Plaintiff Kolette A. Page and Cletus A. Page,
14 individually, and on behalf of their individual retirement accounts (“Plaintiff”), on
15 the one hand, and Defendant Happy State Bank & Trust Company dba Goldstar
16 Trust Company. (“Defendant”), on the other hand, by and through their
17 undersigned counsel of record, hereby stipulate and agree as follows:

18 WHEREAS, Plaintiff filed an Initial Complaint against Defendant on July 9,
19 2018;

20 WHEREAS, the original deadline for Defendant to respond to Plaintiff’s
21 Initial Complaint (whether by motion, answer or otherwise) is August 10, 2018.

22 WHEREAS, by entering into this stipulation Defendant is not waiving any
23 defenses, including, but not limited to, personal jurisdiction, venue, forum non
24 conveniens, and/or mandatory arbitration.

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1 IT IS HEREBY AGREED AND STIPULATED, pursuant to Local Rule 8-3,
2 that Defendant's deadline to respond to Plaintiff's Initial Complaint, whether by
3 answer, motion or otherwise, is hereby extended by 30 days up to and including
4 September 10, 2018.

5 **IT IS SO STIPULATED.**

6 Dated: July 31, 2018

DORSEY & WHITNEY LLP

7 By: /s/ Faisal M. Zubairi¹
8 Faisal M. Zubairi
9 Scott D. Goldsmith
10 Attorneys for Defendant
11 HAPPY STATE BANK & TRUST
12 COMPANY dba GOLDSTAR
13 COMPANY.

14 Dated: July 31, 2018

REIF LAW GROUP, P.C.

15 By: /s/ Brandon S. Reif
16 Brandon S. Reif
17 Attorney for Plaintiff Kolette A. Page
18 and Cletus M. page, individually and
19 on behalf of their individual
20 retirement accounts
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28 ¹ Pursuant to L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am employed in the City of Costa Mesa, County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 600 Anton Boulevard, Suite 2000, Costa Mesa, CA 92626. On July 31, 2018, I served the documents named below on the parties in this action as follows:

DOCUMENT(S) SERVED: STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

SERVED UPON: SEE ATTACHED SERVICE LIST

☐ (BY MAIL) I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Costa Mesa, California. I am readily familiar with the practice of Dorsey & Whitney LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

☒ (BY CM/ECF SYSTEM) The above-referenced document was electronically filed using the Court's CM/ECF system. Pursuant to L.R. 5-3.3, upon the electronic filing of a document, a Notice of electronic Filing (NEF) is automatically generated by the CM/ECF system and sent by e-mail to all attorneys in the case who are registered as CM/ECF users. Service by this electronic NEF constitutes service pursuant to the Federal Rules of Civil Procedure for all attorneys who have consented to electronic service.

☐ (BY PERSONAL SERVICE) I delivered to an authorized courier or driver authorized by **LS Attorney Services LLC** to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed with the court upon request.

☐ (BY FEDERAL EXPRESS) I am readily familiar with the practice of Dorsey & Whitney LLP for collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by Federal Express for overnight delivery.

☐ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court, at whose direction this service was made.

Executed on July 31, 2018, at Costa Mesa, California.

/s/ Maria Santos

Maria Santos

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